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September 3, 2019

**BY ECF**

Hon. Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Ingrid Innes*  
Criminal Docket No. 18-134 (S-2)(KAM)

Dear Judge Matsumoto:

We represent Ingrid Innes and we seek to appear in this matter for the purpose of responding to the government's motion requesting a finding that a document created by Ingrid Innes—for her legal counsel—is not protected by the attorney-client privilege. *See* Docket # 54 (“the attorney-client privilege motion”). Though Ms. Innes has not been arrested or arraigned in this case, her personal attorney-client privilege is at stake in light of the government’s motion.

This Court provided the parties an opportunity to be heard on the pre-trial motions at the status conference currently scheduled for Friday, September 6, 2019. With respect to the attorney-client privilege motion, we request a brief extension to provide us the opportunity to respond in writing by Friday, September 13, 2019. We also request oral argument on the motion and the opportunity to appear telephonically, at a date and time to be scheduled by the Court. We are located in Michigan, and permitting our appearance telephonically will help preserve resources and minimize expense.

The government’s counsel does not object to our request for an extension to respond to the government’s motion, nor does the government object to our request for oral argument or to appear telephonically. With trial not scheduled to begin until October 28, 2019, permitting



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additional time to fully brief and argue this important issue implicating the attorney-client privilege will not interfere with the upcoming trial.

Sincerely,

**VARNUM**

A handwritten signature in black ink that reads "Ron DeWaard".

Ron DeWaard  
Application for Admission Pro Hac Vice Pending

cc:     Sylvia Shweder (by ECF)  
          Gearld M Moody (by ECF)  
          David Gopstein (by ECF)  
          Anthony Ricco (by ECF)